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Attorneys for Defendant

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

FERNANDO LOPEZ,)	CASE NO. 4:22-CV-01742-DMR
)	
Plaintiff,)	
)	SECOND STIPULATION TO EXTEND TIME
v.)	WITHIN WHICH TO ANSWER OR RESPOND
)	AND TO CONTINUE INITIAL CASE
UNITED STATES OF AMERICA,)	MANAGEMENT CONFERENCE
)	
Defendant.)	

Pursuant to Civil Local Rule 6-1(a), the parties to this action stipulate to extend Defendant's time within which to answer or otherwise respond to the complaint until September 6, 2022.

Additionally, pursuant to Civil Local Rules 6-2 and 7-12, the parties to this action hereby stipulate and request that the Court continue the Case Management Conference currently set for August 31, 2022, *see* ECF No. 11, and all associated deadlines until October 5, 2022, at 1:30 p.m.

The parties request this change because the pleadings in this matter are not yet settled, and the parties respectfully suggest that a case management conference will be more productive after Defendant has responded to the complaint.

This is the parties' second joint request to modify the schedule in this case. *See* Declaration of Kelsey J. Helland ¶ 3. The requested modification will not impact the schedule for the case because no further schedule has yet been set and because this matter is still in its initial stages. *Id.* ¶ 4.

DATED: August 2, 2022

Respectfully submitted,

STEPHANIE M. HINDS
United States Attorney

/s/ Kelsey J. Helland
KELSEY J. HELLAND
Assistant United States Attorney
Attorneys for Defendant

DATED: August 2, 2022

/s/ Marie C. Ballon.¹
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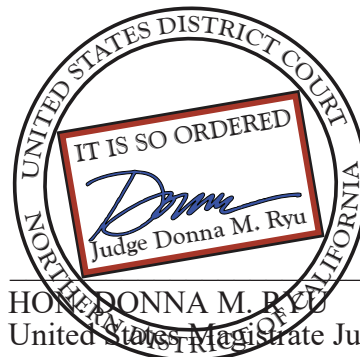
Attorney for Plaintiff

ORDER (AS MODIFIED)

Pursuant to stipulation, IT IS SO ORDERED. The Initial Case Management Conference is continued until October 5, 2022 at 1:30 p.m. in Oakland, by Videoconference only. Parties shall file a joint case management conference statement by September 28, 2022. All parties and counsel, may access the webinar information at <https://www.cand.uscourts.gov/dmr>.

IT IS SO ORDERED AS MODIFIED.

DATED: August 3, 2022



HONORABLE DONNA M. RYU
United States Magistrate Judge

¹ In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury that all signatories have concurred in the filing of this document.

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Attorneys for Defendant

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

FERNANDO LOPEZ,)	CASE NO. 4:22-CV-01742-DMR
)	
Plaintiff,)	
)	DECLARATION OF KELSEY J. HELLAND IN
v.)	SUPPORT OF JOINT STIPULATION TO
)	CONTINUE CASE MANAGEMENT
UNITED STATES OF AMERICA,)	CONFERENCE
)	
Defendant.)	

I, KELSEY J. HELLAND, declare as follows:

1. I am an Assistant United States Attorney and the attorney of record for Defendant in this action. I submit this declaration in support of the parties' Second Joint Stipulation to Continue the Case Management Conference filed concurrently herewith. The facts set forth in this declaration are within my personal knowledge or based upon documents and information I have received in the course of this litigation.

2. On August 1, 2022, counsel for Plaintiff, Marie C. Ballon, and I conferred regarding Defendant's deadline to respond to the complaint and the upcoming case management conference. We agreed to extend the response deadline for 33 days, until September 6, 2022, and to request a continuance of the case management conference because the pleadings in the case are not yet settled.

3. This is the parties' second joint request to modify the schedule for this matter. On June

1 14, 2022, the Court granted, as modified, the parties' first joint request to modify the schedule. *See* ECF
2 No. 11.

3 4. The requested continuance of the case management conference will not affect the
4 schedule for the case because no further schedule has yet been set and because this matter is still in its
5 initial stages.

6
7 I declare under penalty of perjury under the laws of the United States that the above is true and
8 accurate to the best of my information, knowledge, and belief. Executed this 2nd day of August, 2022, in
9 San Francisco, California.

10 /s/ Kelsey J. Helland
11 KELSEY J. HELLAND
12 Assistant United States Attorney
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